

EDWARDS ANGELL PALMER & DODGE LLP

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KEITH TURNER, :

Plaintiff, :

-against- :

NYU HOSPITALS CENTER, NYU MEDICAL
CENTER, NYU SCHOOL OF MEDICINE, and
NYU HEALTH SYSTEM, :

Defendants. :

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06 Civ. 1910 (GBD)

**DECLARATION OF
RACHEL B. JACOBSON**

RACHEL B. JACOBSON declares:

I am a member of the bar of the State of New York and this Court and the law firm of Edwards Angell Palmer & Dodge LLP, counsel for defendants. I make this declaration in further support of Defendants' motion for summary judgment.

1. Exhibit 1 hereto is a copy of the transcript of the March 2, 2010 Court conference.
2. Exhibit 2 hereto is a copy of Defendants' Automatic Disclosures, dated June 1, 2006.
3. Exhibit 3 hereto is a copy of Defendants' Objections and Responses to Plaintiff's First Request For The Production of Documents, dated June 23, 2006.
4. Exhibit 4 hereto is relevant sections of the NYU Hospitals Center Staff Handbook.

5. Exhibit 5 hereto is a copy of the Confidential Personnel Profile form for Hilda Pineda indicating Ms. Pineda's last salary as Operations Manager was \$74,232.86 before the position was eliminated.

6. Exhibit 6 hereto is a copy of the Confidential Personnel Profile form for Udel DeGazon indicating Mr. DeGazon's last salary as Associate Director – Building Services was \$94,917.94 before he was promoted to Interim Director. It also indicates Mr. DeGazon's salary as Interim Director – Building Services was \$104,409.76, effective May 3, 2004.

7. Exhibit 7 hereto is a copy of the Confidential Personnel Profile form for Hilda Pineda indicating Ms. Pineda's salary upon her promotion to Associate Director – Building Services was \$81,656.12 effective June 21, 2004. It also indicates her salary was increased to \$84,514.08 effective December 21, 2004.

8. Exhibit 8 hereto is a copy of the Confidential Personnel Profile form for Joseph Morelos indicating Mr. Morelos' salary as Director – Building Services at the time of his resignation was \$114,384.40.

9. Exhibit 9 hereto is a copy of the Confidential Personnel Profile form for Udel DeGazon indicating Mr. DeGazon's salary as Director – Building Services was \$108,064.06, effective November 1, 2004.

10. Exhibit 10 hereto is a copy of the Confidential Personnel Profile form for Bozena Sutowski indicating Ms. Sutowski's salary as Manager – Building Services at the time of her termination was \$58,299.80.

11. Exhibit 11 hereto is a copy of the Confidential Personnel Profile form for Robert Stephen indicating Mr. Stephen's salary upon his promotion to Manager- Building Services was \$47,600.00, effective June 21, 2004.

12. Exhibit 12 hereto is a copy of the Confidential Personnel Profile form for Robert Stephen indicating Mr. Stephen's salary as Manager – Building Services was \$49,265.84, effective December 21, 2004.

Dated: New York, New York
October 29, 2010

s/ Rachel Jacobson

Rachel B. Jacobson